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Carlos Calderon, Michael Minev,
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HYKEEM WELDON,

Plaintiff,

v.

NDOC, et al.,

Defendants.

Case No. 2:23-cv-01209-MMD-DJA

**DEFENDANTS' MOTION FOR
EXTENSION OF TIME TO FILE
PROPOSED JOINT PRETRIAL
ORDER
(SECOND REQUEST)**

Defendants, Carlos Calderon, Michael Minev, Gabriela Najera, and Jose Navarrete, by and through Aaron D. Ford, Attorney General for the State of Nevada, and Mark Hackmann, Deputy Attorney General, hereby move this Court for an extension of time to file the Joint Pretrial Order (JPTO). This is the second requested extension of time.

MEMORANDUM OF POINTS AND AUTHORITIES

I. FACTUAL ANALYSIS

This is a *pro se* prisoner 42 U.S.C. § 1983 civil rights claim brought by offender Hykeem Weldon (Weldon). This Court entered a scheduling order on August 1, 2024, with a JPTO deadline of December 30, 2024. ECF No. 25.

On October 23, 2024, this Court granted Plaintiff's motion to extend discovery. ECF No. 32. A modified scheduling order was issued with a JPTO deadline of February 12, 2025. ECF No. 32. No dispositive motions have been filed so there is no suspension of the deadline

1 for that reason. This Court granted Defendants' Motion for Extension of Time to File
2 Proposed JPTO on February 12, 2025, and ordered the JPTO due March 14, 2025. ECF No.
3 34.

4 Defendants now file a Motion for Extension of Time to File the proposed Joint
5 Pretrial Order (Second Request) and request an additional forty-five (45) days to file the
6 proposed Joint Pretrial Order.

7 **II. ARGUMENT**

8 Defense counsel respectfully requests a forty-five (45) day extension of time to file
9 the JPTO from the current deadline of March 14, 2025, to April 28, 2025, due to unexpected
10 challenges in coordinating with Plaintiff.

11 **A. Current Deadlines**

12 Joint pretrial order: March 14, 2025

13 **B. Proposed Deadlines**

14 Joint pretrial order: April 28, 2025

15 **C. Good Cause Supports this Request**

16 Federal Rule of Civil Procedure 16(b) allows parties to request extensions of
17 deadlines set in the Court's scheduling order. Good cause exists for the requested extension.
18 LR 26-3. Defendants' counsel needs additional time to complete the proposed order in
19 cooperation with the Plaintiff who is currently incarcerated.

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1 **III. CONCLUSION**

2 Defendant, by and through counsel, respectfully requests this Court extend the
3 deadline for the proposed Joint Pretrial Order. Defendants assert the requisite good cause
4 is present to warrant an extension of time. Therefore, the Defendants request additional
5 time, up until **April 28, 2025**, to file the proposed Joint Pretrial Order in this matter.

6 DATED this 13th day of March 2025.

7 AARON D. FORD
8 Attorney General

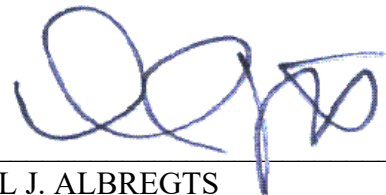
9 By: /s/ Mark Hackmann
10 MARK HACKMANN, Bar No. 16704
Deputy Attorney General

11 *Attorneys for Defendants*

12 Given Defendants' representations that they are having difficulty coordinating with Plaintiff,
13 who is incarcerated, the Court finds good cause to grant Defendants' motion to extend time
(ECF No. 35).

14 IT IS THEREFORE ORDERED that Defendants' motion to extend time (ECF No. 35) is
15 GRANTED and the parties joint pretrial order is due by April 28, 2025.

16 IT IS FURTHER ORDERED that the Clerk of Court is kindly directed to send Plaintiff a copy
17 of this order.

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22 DANIEL J. ALBREGTS
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: March 14, 2025
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CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on March 13, 2025, I electronically filed the foregoing, **DEFENDANTS' MOTION FOR EXTENSION OF TIME TO FILE PROPOSED JOINT PRETRIAL ORDER (SECOND REQUEST)**, via this Court's electronic filing system. Parties who are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, addressed to the following:

Hykeem Weldon #1104578
Three Lakes Valley Conservation Camp
PO Box 208
Indian Springs, NV 89070
Plaintiff, Pro Se

/s/ Karen Easton
An employee of the
Office of the Nevada Attorney General